

**ENGINEERING STATEMENT**

**Jeffery Scott**

**6/28/91**

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The reference coordinates used for the Bethany Beach allotment are listed by the Commission as:

38° 32' 22" N. Latitude

75° 03' 20" W. Longitude

The attached Table 1 is a frequency search, conducted using the increased separation criteria presently found in Section 73.207 for these reference coordinates. Examination of Table 1 shows that the Bethany Beach reference point itself is short-spaced with respect to stations WESR, WMGM, and WOCQ. Under the modified provisions of Section 73.213(c), the reduced mileage separations found in 73.213(c)(1) are applicable to these stations. Table 2 demonstrates that the proposed site meets these reduced separation standards.

As also shown on Table 1, however, the Bethany Beach reference coordinates are located 182.5 kilometers from the WGMS-FM transmitter site and hence meet the current separation requirement found in Section 73.207 of 178 kilometers. Once the modification takes place to Section 73.213(c), the separations contained in Section 73.213(c)(1) are no longer applicable with respect to WGMS-FM.

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Alternative Showing

Short-spacings, in some situations up to 8 kilometers, are permitted under Section 73.215 of the Rules. As demonstrated in the attached amendment, operation at the proposed site with the specified facilities is in full compliance with the contour overlap provisions of Section 73.215 with respect to WGMS. Accordingly, processing under the provisions of Section 73.215 is hereby requested. No changes must be made to the facilities or from the location proposed in the May 16 amendment.

Federal Aviation Administration

Relocation to the proposed site was initially specified in the May 16, 1991 amendment and a representation made that the FAA was notified of the proposed relocation. Although an FAA Form 7460-1 was prepared for submission to the FAA concerning the proposed construction, receipt of that form has not been acknowledged by the FAA and the form was apparently lost or misplaced sometime after its preparation. Out of an abundance of caution, a replacement Form 7460-1 has been filed with the FAA.

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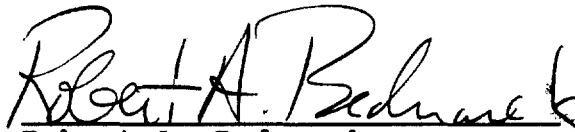
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This Engineering Statement was prepared by me or under my direction. All of the facts contained herein are true except where stated to be on information or belief and to those facts I believe them to be true.

A handwritten signature in cursive script, reading "Robert A. Bednarek". The signature is written in dark ink and is positioned above a horizontal line.

**Robert A. Bednarek**

**June 28, 1991**

Study Name : Bethany Beach, Delaware - Reference Point  
 Channel : 278A  
 Study Coordinates : 38 32 22.0 N 75 3 20.0 W  
 Separations : FM Zone 2 - Commercial  
 Spacing : Section 73.207

Call City / State	File - Number	Channel Status	ERP HAAT	Ant Zone	Latitude Longitude	Dist Bear	Req'd (km)	Clear (km)
WGMD REHOBOTH BEACH, DE	BLH 6807	224A LIC	3.00 300	1	38 42 5 75 11 58	21.9 325.3	10.0	11.9 CLOSE
WESRFM ONLEY-ONANCOCK, VA	BMLH 624	277B LIC	50.0 320	1	37 43 2 75 41 1	106.6 211.2	113.0	-6.4 SHORT
BETHANY BEACH, DE		278A ALC		2	38 32 22 75 3 20	0.0 0.0	115.0 Comnt	-115.0 SHORT
NEW BETHANY BEACH, DE	BPH 910213ME	278A APP	0.83 338	2	38 31 45 75 4 50	2.5 242.3	115.0 Comnt	-112.5 SHORT
NEW BETHANY BEACH, DE	BPH 910213MF	278A APP	3.00 328	2	38 34 21 75 6 58	6.4 304.9	115.0 Comnt	-108.6 SHORT
WGMSFM WASHINGTON, DC	BPH 900205IG	278B CP	44.0 518	DA 1	38 56 9 77 5 33	182.5 284.6	178.0 Comnt	4.5 CLOSE
WGMSFM WASHINGTON, DC	BLH 880104KE	278B LIC	34.2 510	1	38 56 9 77 5 33	182.5 284.6	178.0	4.5 CLOSE
WMGM ATLANTIC CITY, NJ	BLH 850322KK	279B LIC	50.0 347	1	39 23 38 74 30 34	106.0 26.3	113.0	-7.0 SHORT
WXCY HAVRE DE GRACE, MD	BLH 900118KD	279B LIC	50.0 341	DA 1	39 33 55 76 7 8	146.4 321.5	113.0	33.4
WOCQ BERLIN, MD	BPH 900111IB	280A APP	6.00 328	1	38 22 58 75 18 58	28.6 232.6	31.0 Comnt	-2.4 SHORT
WOCQ BERLIN, MD	BLH 850423KS	280A LIC	3.00 328	1	38 22 58 75 18 58	28.6 232.6	31.0	-2.4 SHORT

End of Study.

Study Name : Bethany Beach, Delaware - Proposed Site  
 Channel : 278A  
 Study Coordinates : 38 34 21.0 N 75 6 58.0 W  
 Separations : FM Zone 2 - Commercial  
 Spacing : Section 73.213(c)(1)

Call City / State	File - Number	Channel Status	ERP HAAT	Ant Zone	Latitude Longitude	Dist Bear	Req'd (km)	Clear (km)
WGMD REHOBOTH BEACH, DE	BLH 6807	224A LIC	3.00 300	1	38 42 5 75 11 58	16.0 333.2	8.0	8.0 CLOSE
WESRFM ONLEY-ONANCOCK, VA	BMLH 624	277B LIC	50.0 320	1	37 43 2 75 41 1	107.2 207.7	105.0	2.2 CLOSE
BETHANY BEACH, DE		278A ALC		2	38 32 22 75 3 20	6.4 124.9	105.0 Comnt	-98.6 SHORT
NEW BETHANY BEACH, DE	BPH 910213ME	278A APP	0.83 338	2	38 31 45 75 4 50	5.7 147.3	105.0 Comnt	-99.3 SHORT
NEW BETHANY BEACH, DE	BPH 910213MF	278A APP	3.00 328	2	38 34 21 75 6 58	0.0 0.0	105.0 Comnt	-105.0 SHORT
WGMSFM WASHINGTON, DC	BPH 900205IG	278B CP	44.0 518	DA 1	38 56 9 77 5 33	176.5 283.9	163.0 Comnt	13.5 CLOSE
WGMSFM WASHINGTON, DC	BLH 880104KE	278B LIC	34.2 510	1	38 56 9 77 5 33	176.5 283.9	163.0	13.5 CLOSE
WMGM ATLANTIC CITY, NJ	BLH 850322KK	279B LIC	50.0 347	1	39 23 38 74 30 34	105.3 29.7	105.0	0.3 CLOSE
WXCX HAVRE DE GRACE, MD	BLH 900118KD	279B LIC	50.0 341	DA 1	39 33 55 76 7 8	140.3 322.2	105.0	35.3
WOCQ BERLIN, MD	BPH 900111IB	280A APP	6.00 328	1	38 22 58 75 18 58	27.4 219.6	27.0 Comnt	0.4 CLOSE
WOCQ BERLIN, MD	BLH 850423KS	280A LIC	3.00 328	1	38 22 58 75 18 58	27.4 219.6	27.0	0.4 CLOSE

End of Study.